

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	) Chapter 11
	)
W. R. GRACE & CO., et al., <sup>1</sup>	) Case No. 01-01139 (AMC)
	) (Jointly Administered)
Reorganized Debtors.	)
	) Hearing Date: November 18, 2020, at 12:00 p.m.
	) Objection Deadline: November 4, 2020, at 4:00 p.m.

---

**NOTICE OF REORGANIZED DEBTORS' NINTH MOTION FOR AN ORDER  
EXTENDING THE CHAPTER 11 PLAN DEADLINE BY WHICH THE  
REORGANIZED DEBTORS MAY OBJECT TO CLAIMS**

TO: (i) the Office of the United States Trustee; (ii) Counsel for the WRG Asbestos PI Trust; (iii) Counsel for the Asbestos PI Future Claimants Representative; (iv) Counsel for Asbestos PD Future Claimants Representative; (v) Counsel for the WRG Asbestos PD Trust (7A); (vi) Counsel for the WRG Asbestos PD Trust (7B); (vii) those parties that requested service and notice of papers in accordance with Fed. R. Bankr. P. 2002; and (xiii) as required by Plan Art. 5.1.1, “all Holders of Plan Claims (other than Asbestos PI Claims, Asbestos PD Claims, and CDN ZAI PD Claims) that are still pending allowance and are not subject to a pending objection.”

On October 21, 2020, the above-captioned reorganized debtors (collectively, the “Reorganized Debtors”) filed the attached *Reorganized Debtors’ Ninth Motion for an Order Extending the Chapter 11 Plan Deadline by Which the Reorganized Debtors May Object to Claims* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A true and correct copy of the Motion is attached hereto.

Responses to the relief requested in the Motion, if any, must be in writing and be filed with the Bankruptcy Court no later than 4:00 p.m. (prevailing Eastern time) on **November 4, 2020**. At the same time, you must also serve a copy of the objections or responses, if any, upon the

---

<sup>1</sup> W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) is the sole remaining Reorganized Debtor and Case no. 01-1139 is the sole remaining open chapter 11 case.

following: (i) co-counsel for the Reorganized Debtor, Kirkland & Ellis LLP (Attn: Adam C. Paul, Esq. and John Donley, Esq.) [adam.paul@kirkland.com](mailto:adam.paul@kirkland.com) and [john.donley@kirkland.com](mailto:john.donley@kirkland.com) and The Law Offices of Roger Higgins, LLC (Attn: Roger J. Higgins, Esq.) [rhiggins@rogerhigginslaw.com](mailto:rhiggins@rogerhigginslaw.com), and Pachulski Stang Ziehl & Jones LLP, (Attn: Laura Davis Jones, Esq. and James E. O'Neill, Esq.) [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com) and [jo'neill@pszjlaw.com](mailto:jo'neill@pszjlaw.com); (ii) the Office of the United States Trustee, (Attn: Richard L. Schepacarter, Esq.) [richard.schepacarter@usdoj.gov](mailto:richard.schepacarter@usdoj.gov); (iii) counsel for the WRG Asbestos PI Trust; Campbell & Levine, LLC, (Attn: Marla Rosoff Eskin, Esq., Mark T. Hurford, Esq. and Philip E. Milch, Esq.) [meskin@camlev.com](mailto:meskin@camlev.com), [mhurford@camlev.com](mailto:mhurford@camlev.com), [pmilch@camlev.com](mailto:pmilch@camlev.com); (iv) counsel for the Asbestos PI Future Claimants Representative, Phillips, Goldman, McLaughlin & Hall, P.A., (Attn: John C. Phillips, Jr., Esq.) [jcp@pgmhlaw.com](mailto:jcp@pgmhlaw.com); (v) counsel for the Asbestos PD Future Claimants Representative, Seitz, Van Ogtrop & Green, P.A., (Attn: R. Karl Hill, Esq.) [khill@svglaw.com](mailto:khill@svglaw.com), and Alan B. Rich Law Office (Attn: Alan B. Rich, Esq.) [alan@alanrichlaw.com](mailto:alan@alanrichlaw.com); (vi) counsel for the WRG Asbestos PD Trust (7A), WRG Asbestos PD Trust, (Attn: Richard B. Schiro, Esq.) [rbschiro@schirolaw.com](mailto:rbschiro@schirolaw.com) and Dykema Cox Smith, (Attn: Deborah D. Williamson, Esq.) [dwilliamson@dykema.com](mailto:dwilliamson@dykema.com); and (vii) counsel for the WRG Asbestos PD Trust (7B), Sullivan Hazeltine Allinson LLC, (Attn: William D. Sullivan, Esq.) [bsullivan@sha-llc.com](mailto:bsullivan@sha-llc.com) and Barnwell Whaley Patterson & Helms LLC, (Attn: M. Dawes Cooke, Esq.) [mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com).

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE OBJECTION WILL BE HELD BEFORE THE HONORABLE ASHELY M. CHAN AT THE UNITED STATES

BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA, ROBERT N.C. NIX FEDERAL COURTHOUSE, 900 MARKET STREET, SECOND FLOOR, COURTROOM 4, PHILADELPHIA, PA 19017, ON **NOVEMBER 18, 2020, AT 12:00 P.M.**  
**PREVAILING EASTERN TIME.**

Dated: October 21, 2020

THE LAW OFFICES OF ROGER HIGGINS, LLC  
Roger J. Higgins  
516 North Ogden Ave.  
Suite 136  
Chicago, IL 60642  
Telephone: (312) 480-1984

and

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill  
Laura Davis Jones (Bar No. 2436)  
James E. O'Neill (Bar No. 4042)  
919 N. Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, DE 19899-8705  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400

Co-Counsel for the Reorganized Debtors